

1 Honorable Timothy W. Dore
2 Chapter 7
3 Hearing Date: **May 13, 2011**
4 Hearing Time: 9:30 a.m.
5 Response Date: **May 9, 2011**
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13 UNITED STATES BANKRUPTCY COURT
14 WESTERN DISTRICT OF WASHINGTON
15 AT SEATTLE
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In re

15 ITI INTERNET SERVICES INC.,
16
17 Debtor.

No. 11-12266-TWD

NOTICE OF JOINT MOTION FOR ORDER:

(1) COMPELLING TRUSTEE TO PROVIDE AN IMMEDIATE ACCOUNTING OF MOVANTS' TRUST FUNDS RECEIVED POST-PETITION;
(2) AUTHORIZING TRUSTEE TO TEMPORARILY OPERATE DEBTOR'S BUSINESS FOR LIMITED PURPOSE; AND
(3) FOR OTHER RELIEF

25 **PLEASE TAKE NOTICE** that the Joint Motion for Order (1) Compelling Trustee
26 to Provide an Immediate Accounting of Movants' Trust Funds Received Post-Petition; (2)
27 Authorizing Trustee to Temporarily Operate Debtor's Business for Limited Purpose of
28 Completing Electronic Processing and Release of Movants' Trust Funds; and (3) for Other
29 Relief Including Removal of Trustee If Warranted (the "Motion"), **IS SET FOR HEARING**
30 **ON SHORTENED TIME** as follows:

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32 JUDGE: The Honorable Timothy W. Dore
33 PLACE: 700 Stewart Street
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35 Courtroom 8106
36 Seattle, WA 98101
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38 DATE: **May 13, 2011**
39 TIME: **9:30 a.m.**
40 RESPONSE DATE: **May 9, 2011**
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42 Copies of the Motion and supporting pleadings are on file with the United States
43 Bankruptcy Court and are available for review during regular business hours. You may also
44 request a copy by email at ida@crockerlaw.com.
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Erman Teicher Miller Zucker & Freedman P.C.
400 Galleria Officentre, Suite 444
Southfield, MI 48034
248-827-4100

1 **YOU ARE FURTHER NOTIFIED** that if the Court grants the Motion, brought
2 pursuant to 11 U.S.C. §§704(a)(7), 721, 324, and Fed. R. Bankr. P. 9013, the Trustee will
3 provide an accounting of certain Partially Processed Payments, thereby allowing processing
4 of funds, and transmittal of those funds to the moving parties. The moving parties contend
5 that \$892,943.72 in Partially Processed Payments should be promptly completed.
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7 **IF YOU OPPOSE THE MOTION**, you must file your written response with the
8 Clerk of Court, 700 Stewart St., Seattle, WA 98101, and deliver copies to the undersigned
9 **NOT LATER THAN May 9, 2011**. If no responses are received, the Court may, at its
10 discretion, enter an order without further notice.
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12 DATED this 25th day of April, 2011.
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15 ERMAN TEICHER MILLER ZUCKER & FREEDMAN
16 P.C.
17

18 By /s/ Craig E. Zucker per fax 4/25/11
19 Craig E. Zucker, MI Bar No. P39907
20 Dianne S. Ruhlandt, MI Bar No. P60483
21 Pro Hac Vice Application Forthcoming
22 Lead Counsel for Electrical Workers Insurance Fund as
23 Receiving Trust Fund for Electrical Workers Fringe Benefit
24 Funds of Local Union #58, IBEW and for Sheet Metal
25 Workers Local Union No. 80 Insurance Trust Fund, as the
26 Receiving Trust
27
28

29 BUTZEL LONG
30
31

32 By /s/ Thomas B. Radom per email 4/25/11
33 Thomas B. Radom, MI Bar No. P24631
34 Pro Hac Vice Application Forthcoming
35 Counsel for BeneSys Inc. and Painters District Council No. 2,
36 as Receiving Trust
37
38

39 CROCKER LAW GROUP PLLC
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41

42 By /s/ Tereza Simonyan
43 Shelly Crocker, WSBA #21232
44 Tereza Simonyan, WSBA #41741
45 Local Counsel
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